

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

East West, LLC (dba Caribbean Crescent), a Virginia
Limited Liability Company,

Plaintiff,

v.

Shah Rahman, a Virginia resident,

and

Caribbean Crescent, Inc., a Virginia Corporation,

Defendants.

Civil Action No. 1:11-cv-1380 (JCC/TCB)

Caribbean Crescent, Inc., a Virginia Corporation,
Counterclaimant,

Counterclaimant and Third-Party Plaintiff,

v.

East West, LLC (dba Caribbean Crescent), a Virginia
Limited Liability Company,

Counterdefendant,

Naeem Zai, a Virginia resident,

and

Mohammed Sadiq, a Virginia resident,

Third-Party Defendants.

**DEFENDANTS' MOTION TO SEAL EXHIBITS TO DECLARATION KATIE
BUKRINSKY IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE
TESTIMONY OF PLAINTIFF'S DAMAGES EXPERT MICHAEL A. EINHORN, Ph. D.**

Defendants Shah Rahman (“Rahman”) and Caribbean Crescent, Inc. (“CCI”) (collectively, “Defendants”) respectfully move the Court for an Order pursuant to Local Civil Rule 5(D), providing that three exhibits attached to the Declaration of Katie Bukrinsky in Support of Defendants’ Motion to Exclude Testimony of Plaintiff’s Damages Expert Michael A. Einhorn, Ph. D., be sealed on the basis that they contain both parties’ confidential trade secret information. The exhibits at issue, Exs. A, C, and E, are expert reports that contain the parties’ highly sensitive financial data, among other non-public, competitively sensitive information. Accordingly, the entire report in each case was designated “attorney’s eyes only” pursuant to the Discovery Confidentiality Order (Dkt. No. 37).

Grounds for the requested relief are set forth in the non-confidential memorandum of law being filed contemporaneously herewith in support of this Motion to Seal.

Dated: August 1, 2012

/s/

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Katie Bukrinsky (VSB # 76549)
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CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send notification of such filing (NEF) to the following:

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